

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

BLOCKFI INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 22-19361 (MBK)

(Jointly Administered)

SUPPLEMENTAL AFFIDAVIT OF SERVICE

I, Paul Pullo, depose and say that I am employed by Kroll Restructuring Administration LLC (“***Kroll***”), the claims and noticing agent for the Debtors in the above-captioned chapter 11 cases.

On February 12, 2024, at my direction and under my supervision, employees of Kroll caused the following documents to be served via First Class Mail on the (ADRID: 11627048), whose name and address is being redacted in the interest of privacy:

- Notice of Expungement of Late-Filed Claims [Docket No. 2023]
- Notice of Expungement of Late-Filed Claims, customized to include the claim number, claimant name, and the date filed for each counterparty, a blank copy of which is attached hereto as **Exhibit A**

On February 12, 2024, at my direction and under my supervision, employees of Kroll caused the following documents to be served via First Class Mail on the (ADRID: 11552340), whose name and address is being redacted in the interest of privacy:

- Notice of Wind-down Debtors’ Twelfth Omnibus Objection to Claims Filed Against Blockfi Wallet LLC (Wallet Account Funds Are Not Property of the Estate and Are Available for Withdrawal in Full) [Docket No. 1878]
- Letter To Creditors Who Filed Proofs of Claims Against Blockfi Wallet LLC, a copy of which is attached hereto as **Exhibit B**

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors’ service address is c/o M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

Dated: February 27, 2024

/s/ Paul Pullo
Paul Pullo

State of New York
County of New York

Subscribed and sworn (or affirmed) to me on February 27, 2024, by Paul Pullo, proved to me on the bases of satisfactory evidence to be the person who executed this affidavit.

/s/ Cindy C. Hosein-Mohan
Notary Public, State of New York
No. 01HO6295177
Qualified in Nassau County
Commission Expires December 30, 2025

Exhibit A

BLOCKFI INC., *ET AL* CHAPTER 11 WIND-DOWN DEBTORS

TO: CREDITORS WHO FILED PROOFS OF CLAIMS AFTER THE MARCH 31, 2023 CLAIMS BAR DATE

RE: THE EXPUNGEMENT OF LATE-FILED PROOFS OF CLAIM FROM THE CLAIMS REGISTER

BlockFi Inc. and its debtor affiliates (collectively, “**BlockFi**” or the “**Wind-Down Debtors**”), as managed by the Plan Administrator, pursuant to their confirmed Chapter 11 Plan of Reorganization (the “Plan”),¹ hereby notify you of the expungement of one or more of the Proofs of Claim you filed.

On January 30, 2023, the United States Bankruptcy Court for the District of New Jersey (the “Bankruptcy Court”) entered the *Order (I) Setting Bar Dates for Submitting Proofs of Claim, (II) Approving Procedures for Submitting Proofs of Claim, (III) Approving Notice Thereof, and (IV) Granting Related Relief* (the “Bar Date Order”) [Docket No. 440].

The Bar Date Order established March 31, 2023 at 5:00 p.m. (prevailing Eastern Time) as the last date and time for certain creditors other than governmental units to file Proofs of Claim based on prepetition Claims against any Debtor (the “Claims Bar Date”).

Per the terms of the confirmed Plan “any and all Proofs of Claim Filed after the Bar Date shall be deemed Disallowed and expunged as of the Effective Date without any further notice to, or action, order, or approval of, the Bankruptcy Court, and Holders of such Claims may not receive any Distributions on account of such Claims, unless such late Proof of Claim has been deemed timely Filed by a Final Order.” Plan, Art. VII.H.

The Wind-Down Debtors have reviewed certain Proofs of Claim, determined that they were filed after the Claims Bar Date, and directed Kroll Restructuring Administration LLC (the “Claims, Noticing, and Solicitation Agent”) to expunge those Proofs of Claim from the Claims Register.

If you are receiving this letter, one or more of the Proofs of Claim you filed after the Bar Date has been expunged. **The expungement of your late-filed Proof(s) of Claim does not affect your ability to receive a distribution on any Claim for which you were scheduled by BlockFi. All customers were scheduled for the dollarized value of the funds held in their BlockFi account(s) as of the petition date.**

If you have questions about this letter, please navigate to <https://blockfi.com/proof-of-claim-faqs/> for additional information about proofs of claim, and to <https://restructuring.ra.kroll.com/blockfi/Home-DocketInfo> to access all documents filed in these Chapter 11 Cases.

Sincerely,

BlockFi, Inc. et al.,

Chapter 11 Wind-Down Debtors

Claim Number:

Date Filed:

¹ On October 3, 2023, the Court entered an order confirming the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications) [Docket No. 1609].

Exhibit B

BLOCKFI INC., ET AL CHAPTER 11 WIND-DOWN DEBTORS

TO: CREDITORS WHO FILED PROOFS OF CLAIMS AGAINST BLOCKFI WALLET LLC

RE: Wind-Down Debtors' Twelfth Omnibus Objection to Claims Filed Against BlockFi Wallet LLC (WALLET ACCOUNT FUNDS ARE NOT PROPERTY OF THE ESTATE AND ARE AVAILABLE FOR WITHDRAWAL IN FULL) [Docket No. 1878]¹

ALL WALLET ACCOUNTS (EXCEPT THOSE ASSOCIATED WITH RETAINED PREFERENCES) HAVE BEEN OPENED AND ALL ASSETS IN THOSE ACCOUNTS ARE AVAILABLE FOR WITHDRAWAL, PURSUANT TO COURT ORDER.

AS A RESULT, ALL CUSTOMERS SHOULD WITHDRAW THEIR WALLET ASSETS IMMEDIATELY. CUSTOMERS DO NOT NEED TO HAVE FILED A CLAIM TO DO SO, AND WALLET ACCOUNTS ARE NOT BEING ADMINISTERED THROUGH THE BANKRUPTCY.

BECAUSE FUNDS IN WALLET ACCOUNTS ARE NOT PROPERTY OF THE BANKRUPTCY ESTATE AND ARE AVAILABLE FOR WITHDRAWAL, THOSE FUNDS ARE NOT A BASIS FOR BANKRUPTCY CLAIMS. ACCORDINGLY, THE WIND-DOWN DEBTORS SEEK TO EXPUNGE THOSE WALLET PROOFS OF CLAIM AS PART OF PREPARING FOR DISTRIBUTIONS ON BANKRUPTCY CLAIMS.

EXPUNGING A WALLET CLAIM WILL NOT AFFECT YOUR ABILITY TO WITHDRAW FUNDS FROM YOUR BLOCKFI WALLET. THE WIND-DOWN DEBTORS URGE YOU TO WITHDRAW ALL FUNDS FROM THE BLOCKFI WALLET AS SOON AS POSSIBLE AND IN NO EVENT LATER THAN DECEMBER 31, 2023.

IN ORDER TO INITIATE A WITHDRAWAL OF YOUR WALLET FUNDS, NAVIGATE TO BLOCKFI.COM AND LOG INTO YOUR ACCOUNT. DO NOT CLICK ON ANY LINKS IN ANY EMAILS YOU RECEIVE, EVEN IF THEY APPEAR TO BE FROM BLOCKFI OR KROLL, AND DO NOT PROVIDE ACCOUNT OR WALLET INFORMATION TO ANYONE OVER THE PHONE.

IF YOU STILL HAVE QUESTIONS AFTER READING THIS NOTICE AND THE OBJECTION, PLEASE VIEW THE CLAIMS AND WALLET WITHDRAWAL FAQs AT:
<https://blockfi.com/proof-of-claim-faqs/> and <https://blockfi.com/wallet-withdrawal-faqs/>

BlockFi Inc. and its debtor affiliates (collectively, “**BlockFi**” or the “**Wind-Down Debtors**”), as managed by their Plan Administrator pursuant to their confirmed Chapter 11 Plan of Reorganization (the “**Plan**”),² have filed the *Wind-Down Debtors' Twelfth Omnibus Objection to Claims Filed against BlockFi Wallet LLC* (the “**Objection**”) [Docket No. 1878]. A copy of the Objection is provided to you with this letter, and available online at <https://restructuring.ra.kroll.com/blockfi/Home-DocketInfo>.

¹ The Objection is attached here and available online at <https://restructuring.ra.kroll.com/blockfi/Home-DocketInfo>. Capitalized terms used but not defined herein shall have the meanings ascribed thereto in the Objection.

² On October 3, 2023, the Court entered an order confirming the *Third Amended Joint Chapter 11 Plan of BlockFi Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications)* [Docket No. 1609].

The purpose of the Objection is to clarify the claims register in the Chapter 11 cases for administrative purposes. Neither the filing of the Objection nor the relief requested herein is intended to, or will, have any impact on the ability of BlockFi clients with funds held in Client Wallet Accounts to withdraw funds from those Accounts. Moreover, any claim a creditor has for funds related to BIA or retail loan collateral is not affected by this Objection, and the proposed expungement of the Wallet Proofs of Claim does not affect the allowance of or distribution upon non-Wallet claims properly filed against the Wind-Down Debtors' estates or scheduled by the Wind-Down Debtors. Even if you mistakenly included a claim for BIA or retail loan collateral funds on a Wallet Proof of Claim you will still receive a distribution for those funds under the terms of the Plan and per the Wind-Down Debtors' books and records.

The Bankruptcy Court previously held that funds held in Client Wallet Accounts are property of the respective account holders and are not property of the BlockFi estates. As such, the Court authorized the Debtors and Wind-Down Debtors to return the funds in Wallet Accounts directly to the account holders through a process outlined in, among other publicly available documents, Article II.D of the Plan. The Debtors made withdrawals available prior to the Plan's Effective Date and the Wind-Down Debtors are continuing to facilitate withdrawals as previously contemplated.

Because Wallet Accounts are open for withdrawals (with limited exceptions relating to Retained Preference Actions) outside the bankruptcy process, claims for return of funds in those accounts are not claims to be administered through the bankruptcy process. Accordingly, the Wind-Down Debtors are requesting that any such claims that exist be expunged from the claims register as part of preparations for distributions on claims in the bankruptcy.

If you have questions about the Objection, please navigate to <https://blockfi.com/proof-of-claim-faqs/> and <https://blockfi.com/wallet-withdrawal-faqs/> for additional information about proofs of claim and Wallet withdrawals. The process for formally responding to the Objection is set forth in the Objection attached hereto. You can find more information about BlockFi, the Plan, Wallet Account claims and withdrawals, and related matters at the case notice website, <https://restructuring.ra.kroll.com/blockfi/Home-Index>.

Sincerely,

BlockFi, Inc. et al.,

Chapter 11 Wind-Down Debtors

Debtor: BlockFi Inc *et al.*

Relevant Case Numbers: BlockFi Wallet LLC 22-19366

Twelfth Omnibus Objection

Any funds held in your Wallet are **NOT** impacted by the expungement of the BlockFi Wallet LLC claim amounts below.

To view and withdraw your Wallet balance, login to BlockFi.com. For more information on Wallet withdrawals, view the FAQs at <https://blockfi.com/wallet-withdrawal-faqs/>. For more information on the claims process, view the FAQs at <https://blockfi.com/proof-of-claim-faqs/>.

Any claims you may have related to your BlockFi Interest Account (BIA) or your retail loan collateral are also **NOT** affected by the expungement of the claims below. Any proof of claims you may have filed regarding your BIA or retail loan collateral claims will be handled separately. If you did not file any other proofs of claim, you will receive a pro-rata distribution based on your scheduled amounts according to the Debtors' books and records.

Claimant Name	Proof of Claim No.	Filed Debtor Entity	Action	Note